UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION

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ALFONSO SERRANO,

Plaintiff(s), Index No.: 07CV1703

-against-

NOTICE OF ADOPTION

1:21-MC-00102-AKH

LIBERTY PLAZA CO., LLC., BLACKMONMOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BROOKFIELD FINANCIAL

PROPERTIES, INC., BROOKFIELD FINANCIAL

BATTERY PARK CITY AUTHORITY, BFP ONE

PROPERTIES, LP, BROOKFIELD PARTNERS,

LP, BROOKFIELD PROPERTIES

CORPORATION, BROOKFIELD PROPERTIES

HOLDINGS INC., GENERAL RE SERVICES

CORP., HILLMAN ENVIRONMENTAL GROUP,

LLC., NATIONAL ASSOCIATION OF

SECURITIES DEALERS, INC., NEW LIBERTY

PLAZA LP, NEW YORK CITY ECONOMIC

DEVELOPMENT CORPORATION, NEW YORK

CITY INDUSTRIALDEVELOPMENT AGENCY,

NEW YORK CITY INDUSTRIAL

DEVELOPMENT CORPORATION, ONE

LIBERTY PLAZA, THE BOARD OF

MANAGERS OF THE ONE LIBERTY PLAZA

CONDOMINIUM (CONDO #1178), THE ONE

LIBERTY PLAZA CONDOMINIUM (CONDO

#1178), TUCKER ANTHONY, INC., VERIZON

COMMUNICATIONS, INC., VERIZON NEW

YORK, INC, VERIZON PROPERTIES, INC.,

WFP ONE LIBERTY PLAZA CO., L.P., WFP

ONE LIBERTY PLAZA, CO. GP, CORP., WFP

TOWER A CO., WFP TOWER A CO. G.P.

CORP., WFP TOWER A. CO., L.P., AND

WORLD FINANCIAL PROPERTIES, L.P., ET AL,

Defendant(s).

COUNSELORS:

PLEASE TAKE NOTICE that Defendant, HILLMANN ENVIRONMENTAL GROUP, LLC, (hereinafter HILLMANN) as and for it's response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 2, 2007, In re World Trade Center Lower Manhattan Disaster Site Litigation, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, HILLMANN, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, HILLMANN, also adopts all affirmative defenses and the jury demand herein.

WHEREFORE, Defendant, HILLMANN, demands judgment dismissing the above captioned action against it along with the costs and disbursements of this action.

Dated: White Plains, New York September 11, 2007

Yours, etc.,

SAM ROSMARIN, PLLC

By:

Salvatore J. Calabrese, Esq. (5133)

Attorneys for Defendant

HILLMANN ENVIRONMENTAL GROUP LLC

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AFFIDAVIT OF SERVICE

STATE OF NEW YORK: COUNTY OF WESTCHESTER:

Cristina A. Villani, being duly sworn, says, I am not a party to the action, am over 18 years of age and reside at White Plains, New York.

On September 11th, 2007 I filed with the USDC pursuant to ECF filing instructions under Case No.: 1:21-mc-00102-AKH and emailed a true copy of the annexed DEFENDANT HILLMAN ENVIRONMENTAL GROUP LLC NOTICE OF ADOPTION by electronic mailing the same to the following parties at their last known electronic mailing address:

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All parties indicated on the SERVICE RIDER

Sworn to before me this 11th day of September 2007

Charlene S. Rogers Notary Public No. 01RO 4703494 Qualified in Westchester County Commission Expires 11/30/09

Cristina A. Villani

Custra a. Villai